

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILAGROS IMPORTS LIMITED,

Plaintiff,

-against-

PROGRESS VANTAGE LIMITED,

Defendant.

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

07 Civ. 3215 (SHS)

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Daniel S. Moretti, a member in good standing of the Bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of:

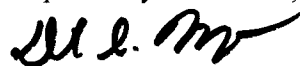
Vanessa Soriano Power
Stoel Rives LLP
600 University Street, Suite 3600
Seattle, Washington 98101
Phone: (206) 386-7553
Fax: (206) 386-7500

There are no pending disciplinary proceeding against Ms. Power in any State or Federal court. Counsel for Defendant Progress Vantage Limited, Benjamin Felcher Leavitt, has consented to Ms. Power's *pro hac vice* admission.

WHEREFORE, it is respectfully requested that the motion to admit Vanessa Soriano Power, *pro hac vice*, to represent Plaintiff in the above-captioned matter, be granted.

DATED: February 13, 2008
New York, New York

Respectfully submitted,



Daniel S. Moretti (DM 6630)
Landman Corsi Ballaine & Ford P.C.
120 Broadway, 27th Floor
New York, New York 10271-0079
(212) 238-4800
(212) 238-4848 (fax)

Attorneys for Plaintiff
Milagros Imports Limited

TO: Vanessa Soriano Power, Esq.
Stoel Rives, LLP
600 University Street, Suite 3600
Seattle, Washington 98101
(206) 624-0900

Storch, Amini & Munues, P.C.
Attorneys for Defendant
140 E 45th Street, 25th Floor
New York, New York 10017
(212) 490-4100

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILAGROS IMPORTS LIMITED,

Plaintiff,

-against-

PROGRESS VANTAGE LIMITED,

Defendant.

**DECLARATION OF DANIEL MORETTI
IN SUPPORT OF UNOPPOSED MOTION
TO ADMIT COUNSEL PRO HAC VICE**

07 Civ. 3215 (SHS)

DANIEL S. MORETTI, hereby declares the truth of the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a member of the firm Landman Corsi Ballaine & Ford P.C., counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Motion to Admit Counsel *Pro Hac Vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the Bar of the State of New York. I was admitted to practice law in New York in 1985. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with the Court.

3. I have known Vanessa Soriano Power since 2007. Ms. Power is an attorney at Stoel Rives LLP in Seattle, Washington. She is a member of the Bar of the State of Washington and the State of Montana, and is admitted to the Bar of the United States District Court for the Western District of Washington. I have found Ms. Power to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure. (A Certificate of Good Standing is attached hereto at Exhibit A.)

4. Accordingly, I am pleased to move the admission of Vanessa Soriano Power, *pro hac vice*.

5. Counsel for Defendant has advised that he does not oppose this application.

6. I respectfully submit a proposed order granting the admission of Vanessa Soriano power, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Vanessa Soriano Power, *pro hac vice*, to represent Plaintiff in the above-captioned matter, be granted.

DATED: February 13, 2008
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Daniel S. Moretti', written over a horizontal line.

Daniel S. Moretti (DM 6630)

Exhibit A

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION
OF
VANESSA SORIANO POWER
TO PRACTICE IN THE COURTS OF THIS STATE

BAR NO. 30777

CERTIFICATE OF GOOD

STANDING

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

VANESSA SORIANO POWER

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on November November 27, 2000, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 8th day of February, 2008.



Ronald R. Carpenter
Supreme Court Clerk
Washington State Supreme Court



Certificate of the Clerk of the Supreme Court of the State of Montana

I, ED SMITH, Clerk of the Supreme Court
of the State of Montana, do hereby certify that VANESSA SORIANO POWER

SEATTLE, WASHINGTON

was on the 17TH day of MARCH, 2004 duly
admitted to practice as an attorney and counselor at law in all the courts of this state; and that
his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good
standing.

Witness my hand and the seal of the court,

this 14TH day of FEBRUARY 20 08

A handwritten signature in cursive script, appearing to read "Ed Smith", is written over a horizontal line.
Clerk of the Supreme Court

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILAGROS IMPORTS LIMITED,

Plaintiff,

-against-

PROGRESS VANTAGE LIMITED,

Defendant.

**ORDER FOR ADMISSION PRO
HAC VICE UPON WRITTEN MOTION**

07 Civ. 3215 (SHS)

Upon the motion of Daniel S. Moretti, attorney for Plaintiff, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Vanessa Soriano Power, Esq.
Stoel Rives, LLP
600 University Street, Suite 3600
Seattle, Washington 98101
(206) 624-0900

is admitted to practice *pro hac vice* as counsel for in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED: February __, 2008
New York, New York

United States District/Magistrate Judge

AFFIDAVIT OF SERVICE BY MAIL

[illegible]

RYAN NEW, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at NEW YORK, NEW YORK.

That on the 19th day of February, 2008, deponent served the within **MOTION TO ADMIT COUNSEL PRO HAC VICE WITH DECLARATION IN SUPPORT AND PROPOSED ORDER** upon:


Storch, Amini & Munues, P.C.
Attorneys for Defendant
140 East 45th Street, 25th Floor
New York, New York 10017

attorneys in this action, at the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States post office department within the State of New York.



Ryan New

Sworn to before me this
19th day of February, 2008



Notary

Laurie Egan
Notary Public, State of New York
No. 01EG5062768
Qualified in Orange County
Commission Expires Aug. 7, 2010